

United States District Court  
Southern District of Texas  
FILED

JAN 02 2020

## UNITED STATES DISTRICT COURT

for the

David J. Bradley, Clerk

Southern District of Texas

United States of America

v.

Minerva SOTO

COB: USA

YOB: 1971

Case No. M-20-0001-M

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 31, 2019 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

## Code Section

18 USC 554

## Offense Description

Did knowingly and unlawfully export or attempt to export from the United States, any merchandise, article, or object, to wit: 50 rounds of 9mm ammunition, contrary to any law or regulation of the United States, in that the Defendant had not obtained a license or written authorization for such export, in violation of Title 22, United States Code, Section 2778, all in violation of Title 18, United States Code, Section 554.

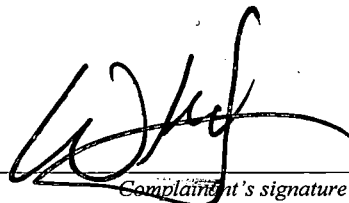
This criminal complaint is based on these facts:

See ATTACHMENT "A"

☒ Continued on the attached sheet.

Approved by AUSA S. DIPIAZZA 1/2/20

S. DiPiazza



Complainant's signature

William A. Hartley, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 1/2/20 @ 8:07 a.m.


Judge's signature

City and state: McAllen, Texas

Juan Alanis, U.S. Magistrate Judge

Printed name and title

#### ATTACHMENT "A"

On December 31, 2019, at approximately 2:41 p.m., the subject later identified as Minerva SOTO (hereinafter referred to as "SOTO") was encountered and selected for an outbound inspection while traveling from the United States towards Mexico at the Hidalgo, Texas Port of Entry. SOTO was driving a white Jeep Wrangler bearing Texas License Plates KJM4292. A Customs and Border Protection Officer (CBPO) asked SOTO if she had any currency in excess of \$10,000.00 United States Dollars (USD), weapons or ammunition, at which time SOTO stated she did not.

While inspecting the trunk area of the white Jeep Wrangler, a CBPO discovered an Academy Sports & Outdoors store shopping bag with beef jerky inside. The CBPO proceeded to ask SOTO if she had purchased anything else besides beef jerky at the Academy Sports & Outdoors store, at which time SOTO stated that the beef jerky was all she had purchased. The CBPO then asked to see the receipt from SOTO. While SOTO proceeded to locate the receipt in her purse, SOTO then stated, "Let me be honest with you, I did purchase a box of bullets." The CBPO then asked to see the ammunition from SOTO, at which time she proceeded to pull out a box of 50 rounds of Monarch 9mm Luger ammunition from her purse.

During the interview, under rights advisement and waiver, SOTO stated that she travels to Mexico regularly. SOTO admitted to purchasing the ammunition at an Academy Sports & Outdoors store earlier in the day. SOTO stated that she knew it was illegal to bring this ammunition into Mexico. SOTO stated that she did not know she needed a license to export this ammunition from the United States. SOTO stated that she did not have a license to export this ammunition from the United States but stated once again that she knew it was illegal to bring this ammunition into Mexico.

SOTO stated that she did not declare this ammunition to CBP personnel at first, because she knew that she would be in trouble. SOTO stated that she was going to be bringing this ammunition to family members at a ranch in Mexico for New Year's Eve to be used for celebratory gunfire and related celebrations.